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**DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION**

WASHINGTON, D.C. 20591



Mr. Anthony R. Romano  
Vice President & General Manager  
Analog Training Computers, Inc.  
185 Monmouth Parkway  
W. Long Branch, New Jersey 07764

July 22, 1980

Dear Mr. Romano:

This is in response to your June 27 letter regarding the use of the ATC-810 flight simulator for pilot training under Part 61, Certification: Pilots and Flight Instructors, and Part 141, Pilot Schools.

The ATC-810 flight simulator contains sufficient features to permit its use for both the 50 and 100 percent maximum simulation times authorized by Part 141.

With the enclosed pilot station, the trainer meets the requirements of Section 141.41(a)(2) for 50 percent of the allowable simulator times. With the further addition of the X-Y plotter, the trainer meets the requirements of Section 141.41(a)(1) and may be used to meet the 100 percent maximum authorization provided total simulator time is devoted to instrument training and is approved in a training course outline.

The simulator may be used in training the pilot in "controlling and maneuvering an airplane solely by reference to instruments, including descents and climbs using radio for radar directive." However, Part 61 of the regulations provides that an applicant for a private pilot certificate must have at least 40 hours of flight time, all of which must be in an airplane. Therefore, simulator time cannot be credited toward this total time requirement.

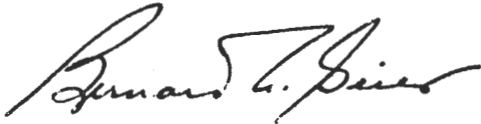
Under Part 61, an applicant for a commercial pilot certificate must have at least 250 hours of flight time as a pilot, which may include 50 hours of instruction from an authorized instructor in a simulator. The ATC-810 simulator will also be acceptable to the Administrator for this purpose.

An applicant for an instrument rating under Part 61 must have at least 40 hours of instrument flight time, which may include 20 hours of instrument instruction by an authorized instrument instructor (ground or flight) in a simulator. The ATC-810 may also be used for this 20 hours of required instruction.

The ATC-810 may also be used in connection with maintaining instrument currency under Section 61.57(e); that is, it may be used for three of the required hours of instrument time, as well as performing the required six instrument approaches.

Should you have any other question, do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bernard A. Geier".

BERNARD A. GEIER  
Chief, General Aviation &  
Commercial Division, AFO-800  
Office of Flight Operations